

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA,

CR *21-50025*

Plaintiff,

REDACTED INDICTMENT

vs.

Theft of Government Funds
(18 U.S.C. § 641)

TALANA FRANCINE STANDING BEAR,
a/k/a Talana Francine Sitting Up,

False Statement
(18 U.S.C. § 1001)

Defendant.

Misuse by a Representative Payee
(42 U.S.C. § 1383a(a)(4))

The Grand Jury charges:

COUNT I

On or about between February 1, 2016, and March 1, 2018, inclusive, in the District of South Dakota and elsewhere, the defendant, Talana Francine Standing Bear, a/k/a Talana Francine Sitting Up, did embezzle, steal, purloin, and knowingly convert to her use and the use of another, any record, voucher, money, and thing of value of the United States and of any department or agency thereof, in an amount exceeding \$1,000, all in violation of 18 U.S.C. § 641.

COUNT II

On or about between February 1, 2016, and March 1, 2018, inclusive, in the District of South Dakota and elsewhere, the defendant, Talana Francine Standing Bear, a/k/a Talana Francine Sitting Up, did knowingly and willfully make and use a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry, to wit: on or

about September 20, 2018, the defendant, Talana Francine Standing Bear, a/k/a Talana Francine Sitting Up, completed a Representative Payee Report of Benefits and Dedicated Account Form stating, under penalty of perjury, that her minor child Z.M. then resided with her and had resided with her since at least February 1, 2016, well knowing and believing that her minor child Z.M. had not resided with her between February 1, 2016 and March 1, 2018, all in violation of 18 U.S.C. § 1001.

COUNT III

On or about between February 1, 2016, and March 31, 2018, inclusive, in the District of South Dakota and elsewhere, the defendant, Talana Francine Standing Bear, a/k/a Talana Francine Sitting Up, having made application to receive any benefit under Title 42, Chapter 7, Subchapter XVI of the United States for the use and benefit of another person, and having received such benefit, knowingly and willfully converted such benefit and any part thereof, totaling approximately \$13,686.65, to a use other than for the use and benefit of such other person, all in violation of 42 U.S.C. § 1383a(a)(4).

A TRUE BILL:

NAME REDACTED

Foreperson

RONALD A. PARSONS, JR.
United States Attorney

By 